

1. EPA believes security at the Westlake site is adequate. Specific questions about site security should be directed to Republic Services.
2. EPA intends to address questions and comments such as those raised in Dr. Criss' submittal as we plan and implement future remedial actions at the site.
3. On May 16, 2013, MDNR conducted radiological survey in the Bridgeton landfill area. MDNR's survey results indicated background radiation levels at all locations. While MDNR's radiological survey was not specifically intended to evaluate "movement of the top 1 foot of contaminated soil by water, air and wildlife," their survey results and EPA's ASPECT results do not show any evidence of movement of surface radiological materials.
4. It is likely that the soil removed from the Latty Avenue site and mixed with the barium sulfate residue contained residual amounts of the other radiological wastes stored there as identified in the referenced document. However, assuming that the NRC has no more information than is included in these and other documents in EPA's possession, it is impossible to say how much radiological material this soil contained. Since the Congo raffinate and Colorado raffinate were valuable enough to justify drying and shipping these materials to Colorado, it is likely that very little of this material was left on-site.

The NRC made a mathematical error on the first page of its November 1, 1974 letter to Cotter Corporation when it calculated the uranium concentration in the mixture of leached barium sulfate residue and soil as 0.0001%. The value should have been 0.01%. Regardless of the percentage calculation, the *amount* of uranium in this mixture (seven tons) has been consistently reported by NRC and EPA and is not in question. Most importantly, EPA has extensive analytical results for the materials actually present in West Lake Landfill, as reported in the Remedial Investigation Report, the Record of Decision, and other documents in the Administrative Record. The actual site conditions, analytical results and risk assessments form the basis for EPA's decision-making at the site.

According to the NRC's November 1, 1974 letter to Cotter Corporation, in the last paragraph on page 4, "The only residue then remaining at the site was the 8700 tons of leached barium sulfate." In the context of this paragraph, this was the condition at the site just prior to mixing the leached barium sulfate with the surface soils at the Latty Avenue site. While not explicitly accounted for in the NRC's letter, these miscellaneous residues were apparently not included in the materials sent to the West Lake Landfill. DOE may have further information on the disposition of these miscellaneous residues.